

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
)
v.) CRIMINAL NO. 04-cr-30004-MAP
)
)
ROOSEVELT ARCHIE,)
Defendant.)
)

JOINT MOTION FOR AN ORDER OF EXCLUDABLE DELAY

The United States of America, by Michael J. Sullivan, United States Attorney for the District of Massachusetts, and the Defendant, through his counsel Attorney Vincent Bongiorni, respectfully move for an order of excludable delay under the Speedy Trial Act, 18 U.S.C. §3161(h)(8). In support of this motion the government states the Defendant has recently indicated, directly and through counsel, his desire to resolve the above-captioned case through a change of plea. The government provided a plea agreement to counsel for Defendant on May 18, 2005. Attorney Bongiorni has requested more time to review the agreement with the Defendant.

It is in the best interests of the Defendant, the government, and the public, to exclude the time from May 27, 2005, until July 11, 2005 from the period within which the trial of this case must commence under the Speedy Trial Act.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By: /s/ Paul Hart Smyth

Paul Hart Smyth
Assistant U.S. Attorney

Dated: July 6, 2005

CERTIFICATE OF SERVICE

Hampden, ss.

Springfield, Massachusetts
July 6, 2005

I, Paul Hart Smyth, Assistant U.S. Attorney, do hereby certify that I have served a copy of the foregoing by mail to Attorney Vincent Bongiorni, 95 State Street, Springfield, MA.

Paul Hart Smyth
Assistant U.S. Attorney